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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RICHARD ZEITLIN, ADVANCED
TELEPHONY CONSULTANTS, MRZ
MANAGEMENT, LLC, DONOR
RELATIONS, LLC, TPFE, INC.,
AMERICAN TECHNOLOGY SERVICES,
COMPLIANCE CONSULTANTS,
CHROME BUILDERS CONSTRUCTION,
INC., and UNIFIED DATA SERVICES,

Plaintiffs,

v.

BANK OF AMERICA, N.A. and JOHN
and JANE DOES 1-100,

Defendants.

Case No. 2:18-cv-01919-RFB-BNW

**JOINT STIPULATION TO EXTEND
DEADLINES TO AMEND BRIEFING
SCHEDULE ON THE REFILED
SECOND MOTION TO COMPEL
(Second Request)**

Pursuant to Local Rules IA 6-1, IA 6-2, and 7-1, Plaintiffs Richard Zeitlin, Advanced Telephony Consultants, MRZ Management, LLC, Donor Relations, LLC, TPFE, Inc., American Technology Services, Compliance Consultants, Chrome Builders Construction, and Unified Data Services, (hereinafter the "Plaintiffs"), and the Defendant Bank of America (hereinafter "BANA"), by and through their respective attorneys of record, hereby jointly stipulate to modestly extend the briefing schedule for the Plaintiffs to refile their motion to compel at Doc. 151. (Docs. 181 and 188.) This is the second stipulation requesting an extension of time to extend the deadlines in the briefing

1 schedule involving the refiling of the Motion to Compel. (Doc. 151.) A hearing is scheduled on this
 2 motion on November 30, 2021 at 10:00 a.m. PST and Plaintiffs' refiled Motion to Compel is currently
 3 due October 22, 2021. (Doc. 181.) In support thereof, the Plaintiffs and BANA represent as follows:

4 The Plaintiffs require additional time due to a medical situation that arose in Atty. Bernhoft's
 5 family. Atty. Bernhoft is lead drafter on the brief and is able to re-assign some of the tasks, but will
 6 need one more business day to put the brief in final form.

7 On Thursday evening, October 21st, the Plaintiffs contacted BANA's counsel and discussed
 8 extending the briefing deadlines. Based on those discussions, the Parties stipulate to the following
 9 briefing schedule: Plaintiffs refiled motion to compel discovery due October 25, 2021 (previously due
 10 October 22, 2021); BANA's opposition due on November 12, 2021 (previously due November 11,
 11 2021); and the Plaintiffs' reply remains due on November 22, 2021.

12 Accordingly, the Parties agree that the foregoing constitutes good cause to extend the briefing
 13 schedule deadlines. This is the Parties' second request for an extension of the deadline related to the
 14 refiled Second Motion to Compel. The Parties agree that the requested extension will not prejudice
 15 any Party. No deadline for which an extension is requested herein has expired.

16 Accordingly, the Parties agree there is good cause for entry of the following new deadline:
 17 Plaintiffs' time to refile the Motion to Compel is extended to October 25, 2021, BANA's time to file
 18 an Objection to the Motion to Compel is extended to November 12, 2021, and Plaintiffs' Reply is
 19 extended to November 22, 2021.

20 **IT IS SO STIPULATED.**

21 Dated: October 22, 2021
 22 THE BERNHOFT LAW FIRM, S.C.

Dated: October 22, 2021
 SNELL & WILMER, L.L.P.

23 /s/ Daniel J. Treuden

/s/ Holly E. Cheong

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27 Attorney for Plaintiffs
 28 Appearing *pro hac vice*

Attorneys for Bank of America, N.A.

Order

IT IS SO ORDERED

DATED: 2:41 pm, October 26, 2021

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BRENDA WEKSLER
 UNITED STATES MAGISTRATE JUDGE

Certificate of Service

I hereby certify that on October 22, 2021, I electronically filed and served the foregoing second JOINT STIPULATION TO EXTEND DEADLINES TO AMEND BRIEFING SCHEDULE ON THE REFILED SECOND MOTION TO COMPEL with the Clerk of the Court for the United States District Court for the District of Nevada using the CM/ECF system.

/s/ Daniel J. Treuden

Daniel J. Treuden
Attorney for Plaintiffs